

Source: Take from email written by Ingrid Ward (USEPA) to workgroup members on 07/14/2004,  
Subject: Misc. Metal Implementation Meeting Notes from July 13, 2004.

### **Misc. Metal Implementation Tools development Workgroup**

Meeting Notes

July 13, 2004

Hi Guys,

Thanks to those who were able to join us for the July 13 meeting. Below are the meeting notes. There is also an action item to review several the tools identified in item #3 and to submit comments before the next scheduled meeting.

Meeting Notes:

1. **Change in Next Meeting Date:** I will be out of town during our regular scheduled August meeting so we will move that meeting to **August 10, 2004, 2-3 EST, call-in 919-541-5230** instead.
2. **Resource Issues Have Come Up:** At the meeting, I also discussed a resource issue that has come up. I would like to recap this important issue for those that were not able to attend the meeting.

It looks like PIRG (Program Implementation and Review Group - the group I work for at OAQPS) is going to be disinvesting in MACT tool development in FY05. This means that resources will most likely not be available to continue this project or the Plastic Parts and Products project in FY05 (which starts in October). When I say resources, I mean both financial and employee time.

This situation puts us in a bit of a dilemma since this group has come up with a fairly long list of tools that may be needed for this MACT. During the meeting, we discussed what approach should be taken from this point forward given this new information on resources constraints.

Here is the approach that the group agreed to take for now:

**a. Combining Efforts:** The Misc. Metal and Plastic Parts effort will be combined into one effort. This means that from this point forward, when we refer to misc metal we are also talking about the plastic parts and products MACT.

**b. Narrowing Down Tool Development Efforts:** It was important to group members that we narrow down the scope of what the group will work on so that we can complete what is on our list September 30, 2004 (which is the end of the FY04 contract period) so that we do not run the risk of having "partially done" tools that won't get completed. We discussed what tools are "most important" to provide and decided that, for now, we would develop and review the following tools by September 30, 2004.

\* A brochure, timeline and at least a short Q&A document will be developed for both the Misc. Metal and Plastic Parts rule. In addition, the University of Tenn. has/will be developing an overview summary, virtual tour, timeline, and inspection checklist for Misc. Metal. [See below for more info].

\* We also decided to pick one tool that could be applicable to both Misc. Metal and Plastic Parts. The group decided that the overlap issues would be most beneficial to stakeholders. The team had previously discussed addressing two types of overlaps issues - one dealing with applicability

and the other having to do with overlaps in emission limits, predominate use, etc. Kim Team, Heather Brown and myself will meet on 7/14/04 to identify the scope of this project further. An update will be provided at the next call.

3. **Tools to Review:** Several implementation tools have been drafted for Misc. Metal that workgroup members should review the following tools and provide comments to me prior to the next meeting:

a. **Miscellaneous Metal Brochure** (2-page overview), file "misc metal brochure revision.pdf". The file is in PDF since it was originally created in Publisher. You may find after printing out the file that it doesn't "fold" correctly, we will fix that on the final version. The file "boiler brochure 4-16.ppt" provides an example of a new brochure format the boiler implementation group recently came up with. Although I'm not sure that we'll have an opportunity to change the Misc. Metal brochure format, I thought I'd pass it on since it was very well done and may be of use for other rules you may be working on.



misc metal brochure revision.pdf



Boiler brochure 4-16.ppt

b. **Miscellaneous Metal Timeline**. file "Misc metal-timeline.doc". This file shows you due dates and also provides information on how dates were derived. If you do not wish to see that information, just select "view" and the "markup" on the Word toolbar to remove the information and get a clean copy of the timeline



Misc metal-timeline.doc

c. **Miscellaneous Metal Existing Implementation Tools** - file "Existing Implementation Tools.doc". This file is really just for informational purposes and lists some of the tools that Heather has found while doing a website search. We wanted to list these tools to make sure that stakeholders were aware of other efforts that may be useful for the Misc. Metal rule. We will need to update the file to reflect Plastic Parts.



Existing Implementation Tools.doc

d. **University of Tennessee Tools** - Bill Wiley has also completed the Misc. Metal summary, timeline and virtual tour and needs our help to review the materials. You can access the files by going to <http://www.cis.utk.edu/EPAMACT/other/MMPcoating/Mmpcoat1.shtml>. The inspection checklist is also forthcoming and will most likely be available for review after our next meeting.

I will be updating the tool development plan (<http://www.epa.gov/ttn/atw/misc/review/miscmetalplan.html>) this week to reflect these new changes.

Thanks. Ingrid.